

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

IN RE:)	
)	
DANITA MICHELLE BOHANNON-COHEN,)	CASE NO. 3:17-bk-00151
)	CHAPTER 13
Debtor.)	JUDGE MARIAN F. HARRISON

THE DEADLINE FOR FILING A TIMELY RESPONSE IS: 6/30/2020
IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: 7/8/2020 AT 8:30 A.M. IN
COURTROOM 1, 2ND FLOOR, CUSTOMS HOUSE, 701 BROADWAY, NASHVILLE, TN 37203

**NOTICE OF MOTION TO MODIFY PLAN TO TEMPORARILY SUSPEND CHAPTER 13
PLAN PAYMENTS DUE TO IMPACT OF COVID-19 FOR A PERIOD OF 60 DAYS**

Danita Michelle Bohannon-Cohen has asked the court for the following relief: to temporarily suspend chapter 13 plan payments due to impact of COVID-19 for a period of 60 days.

YOUR RIGHTS MAY BE AFFECTED. If you do not want the court to grant the attached motion by entering the attached order, or if you want the court to consider your views on the motion, then on or before the response date stated above, you or your attorney must:

1. File with the court your response or objection explaining your position. Please note: the Bankruptcy Court for the Middle District of Tennessee requires electronic filing. Any response or objection you wish to file must be submitted electronically. To file electronically, you or your attorney must go to the court website and follow the instructions at: <https://ecf.tnmb.uscourts.gov>.

If you need assistance with Electronic Filing you may call the Bankruptcy Court at (615) 736-5584. You may also visit the Bankruptcy Court in person at: 701 Broadway, 1st Floor, Nashville, TN (Monday - Friday, 8:00 A.M. - 4:00 P.M.).

2. Your response must state the deadline for filing responses, the date of the scheduled hearing and the motion to which you are responding.

If a response is filed before the deadline stated above, the hearing will be held at the time and place indicated above. **THERE WILL BE NO FURTHER NOTICE OF THE HEARING DATE.** You may check whether a timely response has been filed by viewing the case on the court's website at <https://ecf.tnmb.uscourts.gov>.

If you or your attorney does not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter the attached order granting that relief.

Date: June 8, 2020

/s/ Alise Housden
Alise Housden, TN Bar # 34282
Attorney for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

IN RE:)	
)	
DANITA MICHELLE BOHANNON-COHEN,)	CASE NO. 3:17-bk-00151
)	CHAPTER 13
Debtor.)	JUDGE MARIAN F. HARRISON

**DEBTOR'S MOTION TO MODIFY PLAN TO TEMPORARILY SUSPEND CHAPTER 13
PLAN PAYMENTS DUE TO IMPACT OF COVID-19 FOR A PERIOD OF 60 DAYS**

Comes Debtor, Danita Michelle Bohannon-Cohen, by and through counsel, and hereby moves this court for an order temporarily suspending Chapter 13 Plan payments for a period of 60 days.

In support of the motion, Debtor would show the following:

1. The Debtor's income has been impacted by the COVID-19 pandemic. *Refer to the attached Statement of Debtor.*
2. Debtor is currently employed at Pathgroup in Nashville, Tennessee, as a Cash Poster.
3. Due to the impacts of COVID-19, Debtor's employer has directed her to work from home and her hours have been reduced.
4. Debtor is only working approximately 30 hours per week at \$18.00 an hour. Debtor's gross income is approximately \$2,340.00 per month. Debtor's expenses are \$2,216.00. After taxes and insurance, Debtor does not have sufficient income to pay her Chapter 13 plan payment.
5. Debtor applied for unemployment but was denied because Debtor earns more than the benefit amount.
6. Debtor does not know when she will be able to return to full-time work.
7. Despite Debtor's best efforts, funding of the Plan will leave the Debtor without sufficient income to meet necessary living expenses.
8. This suspension will allow the Plan to complete within 60 months.

9. Debtor proposes:

- a. The plan payments be suspended due to the impact of COVID-19 for a period of 60 days beginning upon the filing of this Motion.
- b. During the period of suspension, the Trustee refund to the Debtor any funds received.
- c. After the period of suspension, Plan payments remain at \$377.00 bi-weekly.
- d. After the period of suspension, the guaranteed minimum dividend to allowed unsecured claims remains at sixty percent (60%).
- e. After the period of suspension, the Debtor make all future payments in accordance with the confirmed Chapter 13 Plan.

WHEREFORE, PREMISES CONSIDERED, Debtor, Danita Michelle Bohannon-Cohen, prays for an order temporarily suspending Chapter 13 Plan payments for a period of 60 days beginning with the filing of this Motion.

Dated June 8, 2020

Respectfully submitted,

/s/ Alise Housden
Alise Housden, TN Bar # 34282
Long, Burnett and Johnson, PLLC
302 42nd Avenue North
Nashville, Tennessee 37209
T: (615) 386-0075
F: (615) 864-8419
ecfmail@tennessee-bankruptcy.com

Attorney for Debtor

PROPOSED ORDER

IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:

DANITA MICHELLE BOHANNON-COHEN,)

Debtor.)

CASE NO. 3:17-bk-00151

CHAPTER 13

JUDGE MARIAN F. HARRISON

ORDER TO MODIFY PLAN TO TEMPORARILY SUSPEND CHAPTER 13 PLAN PAYMENTS DUE TO IMPACT OF COVID-19 FOR A PERIOD OF 60 DAYS

Upon consideration of *Debtor's Motion to Modify Plan to Temporarily Suspend Chapter 13 Plan Payments Due to Impact of COVID-19 for a Period of 60 Days*, it appears to the Court that notice of said motion pursuant to LBR 9013 has been given. It further appears to the Court no objections, responses or otherwise have been filed within the twenty-one (21) day response period. It is therefore:

ORDERED the Debtors' Chapter 13 Plan payments be suspended due to the impact of COVID-19 for a period of 60 days beginning upon the date the Motion was filed. It is further

ORDERED the Chapter 13 Trustee shall refund any funds received to the Debtors during the period of suspension. It is further

ORDERED after the period of suspension, Plan payments will remain at \$377.00 bi-weekly. It is further

ORDERED after the period of suspension, the guaranteed minimum dividend payable to the general unsecured creditors will remain sixty percent (60%). It is further

ORDERED after the period of suspension, it is the obligation of the Debtors to make all future payments in accordance with the confirmed Chapter 13 Plan.

IT IS SO ORDERED.

THIS ORDER WAS SIGNED AND ENTERED
ELECTRONICALLY AS INDICATED AT THE TOP
OF THE FIRST PAGE

Approved For Entry By:

/s/Alise Housden

Alise Housden TN Bar# 034282

Long, Burnett & Johnson, PLLC

302 42nd Avenue North

Nashville, TN 37209

T: 615-386-0075

F: 615-864-8419

ecfmail@tennessee-bankruptcy.com

Attorney for Debtor

Exhibit A

IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:)
)
 DANITA MICHELLE BOHANNON-COHEN,) CASE NO. 3:17-bk-00151
) CHAPTER 13
 Debtor.) JUDGE MARIAN F. HARRISON

STATEMENT OF DEBTOR

Debtor, Danita Michelle Bohannon-Cohen, states the following is true to the best of my knowledge, information, and belief:

1. I am currently employed at *Pathgroup* in Nashville, Tennessee, as a Cash Poster.
2. Due to the impacts of COVID-19, my employer has directed me to work from home and my hours have been reduced.
3. I am only working approximately 30 hours per week.
4. I am in the process of applying for unemployment assistance, but I do not know the amount of any unemployment I may receive.
5. I do not know when I may be able to return to full-time work.

I declare under penalty of perjury that the prior statements are true and correct.

Executed on: 6/4/2020

/s/ Danita Michelle Bohannon-Cohen
DANITA MICHELLE BOHANNON-COHEN, *Debtor*

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF TENNESSEE

IN RE: DANITA MICHELLE BOHANNON COHEN

CASE NO: 3:17-bk-00151

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 6/9/2020, I did cause a copy of the following documents, described below,

DEBTOR'S MOTION TO MODIFY PLAN TO TEMPORARILY SUSPEND CHAPTER 13 PLAN PAYMENTS DUE TO
IMPACT OF COVID-19 FOR A PERIOD OF 60 DAYS

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing matrix exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R. Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 6/9/2020

TOTAL MAILINGS = 43
43 MAILINGS @ \$1.00 EACH = \$43.00

/s/ Jon Daniel Long
Jon Daniel Long 31211
Long, Burnett, and Johnson, PLLC
302 42nd Ave. N
Nashville, TN 37209-0000
615 386 0075

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF TENNESSEE

IN RE: DANITA MICHELLE BOHANNON COHEN

CASE NO: 3:17-bk-00151

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 6/9/2020, a copy of the following documents, described below,

DEBTOR'S MOTION TO MODIFY PLAN TO TEMPORARILY SUSPEND CHAPTER 13 PLAN PAYMENTS DUE TO IMPACT OF COVID-19 FOR A PERIOD OF 60 DAYS

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing matrix exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document (s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 6/9/2020



Jay S. Jump
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Jon Daniel Long
Long, Burnett, and Johnson, PLLC
302 42nd Ave. N
Nashville, TN 37209-0000

PARTIES DESIGNATED AS "EXCLUDE" WERE NOT SERVED VIA USPS FIRST CLASS MAIL
PARTIES WITH A '+' AND DESIGNATED AS "CM/ECF E-SERVICE" RECEIVED ELECTRONIC NOTICE THROUGH THE CM/ECF SYSTEM

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
06503
CASE 3-17-BK-00151
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE
MON JUN 8 15-58-52 CDT 2020

~~EXCLUDE~~

~~701 BROADWAY ROOM 170
NASHVILLE TN 372033979~~

ADVANCED DIAGNOSTIC IMAGING
CO ACI
PO BOX 148240
NASHVILLE TN 37214-8240

ADVANCE FINANCIAL
100 OCEANSIDE DRIVE
NASHVILLE TN 37204-2351

ADVANCED DIAGNOSTIC IMAGING
PO BOX 249
GOODLETTSVILLE TN 37070-0249

AFNI
PO BOX 3427
BLOOMINGTON IL 61702-3427

AFNI INC
PO BOX 3517
BLOOMINGTON IL 61702-3517

ASHRO
1112 7TH AVE
MONROE WI 53566-1364

ASHRO LIFESTYLE
CO CREDITORS BANKRUPTCY SERVICE
PO BOX 800849
DALLAS TX 75380-0849

BARRY J GAMMONS
209 10TH AVE SOUTH STE 525
NASHVILLE TN 37203-7102

BUSINESS REVENUE SYSTEMS INC
PO BOX 579
BURLINGTON IA 52601-0579

CENTENIAL MEDICAL CENTER
PO BOX 740757
CINCINNATI OH 45274-0757

CENTENNIAL MEDICAL CENTER
RESURGENT CAPITAL SERVICES
PO BOX 1927
GREENVILLE SC 29602-1927

COMCAST
COMCAST CENTER
1701 JFK BLVD
PHILADELPHIA PA 19103-2899

CREDIT ACCEPTANCE
25505 WEST 12 MILE RD
SUITE 3000
SOUTHFIELD MI 48034-8331

CREDIT SOLUTIONS LLC
2277 THUNDERSTICK DR STE 400
LEXINGTON KY 40505-4878

DAVIDSON COUNTY GENERAL SESSIONS
PO BOX 196304
NASHVILLE TN 37219-6304

FIRST NATIONAL COLLECTION BUREAU INC
PO BOX 1259
OAKS PA 19456-1259

GOODLETTSVILLE UTILITY
215 CARTWRIGHTS ST
GOODLETTSVILLE TN 37072-1424

HARPETH FINANCIAL SERVICES LLC
CO GLEN C WATSON III
PO BOX 121950
NASHVILLE TN 37212-1950

HERS AND HIS PLUMBING LLC
2963 FOSTER CREIGHTON DR
NASHVILLE TN 37204-3716

INSOLVE AUTO FUNDING LLC CO CAPITAL
RECOVE
DEPT 3403
PO BOX 123403
DALLAS TX 75312-3403

INDIAN LAKE FAMILY DENTAL
299A INDIAN LAKE BLVD
HENDERSONVILLE TN 37075-6384

INLAND BANK
CO SUSAN FAULKNER
736 CURREY RD
NASHVILLE TN 37217-2370

JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

MADISON SUBURBAN UTILITY
CO FOX COLLECTION CENTER
PO BOX 528
GOODLETTSVILLE TN 37070-0528

MENDELSON LAW FIRM
PO BOX 17235
MEMPHIS TN 38187-0235

PARTIES DESIGNATED AS "EXCLUDE" WERE NOT SERVED VIA USPS FIRST CLASS MAIL
PARTIES WITH A '+' AND DESIGNATED AS "CM/ECF E-SERVICE" RECEIVED ELECTRONIC NOTICE THROUGH THE CM/ECF SYSTEM

MIDDLE TENNESSEE IMAGING
PO BOX 249
GOODLETTSVILLE TN 37070-0249

MIDNIGHT VELVET
1112 7TH AVE
MONROE WI 53566-1364

MIDNIGHT VELVET
CO CREDITORS BANKRUPTCY SERVICE
PO BOX 800849
DALLAS TX 75380-0849

MIDTOWN PRIMARY CARE PLLC
2011 CHURCH ST STE 201
NASHVILLE TN 37203

NCB MANAGEMENT SERVICES
PO BOX 1099
LANGHORNE PA 19047-6099

NPAS
PO BOX 99400
LOUISVILLE KY 40269-0400

FROST ARNETT
BANKRUPTCY DEPARTMENT
PO BOX 198988
NASHVILLE TN 37219-8988

NASHVILLE ELECTRIC SERVICE
ATTN CREDIT DEPARTMENT
1214 CHURCH STREET
NASHVILLE TN 37246-0002

PENN CREDIT
916 S 14TH STREET
PO BOX 988
HARRISBURG PA 17108-0988

PREMIER RADIOLOGY
PO BOX 440514
NASHVILLE TN 37244-0514

RECEIVABLES PERFORMANCE MANAGEMENT LLC
PO BOX 1548
LYNNWOOD WA 98046-1548

RESULTS PHYSIOTHERAPY
800 CRESCENT CENTRE DR
STE 600
FRANKLIN TN 37067-7286

SANTANDER CONSUMER USA
PO BOX 961245
FT WORTH TX 76161-0244

SKYLINE MEDICAL CENTER
POB 290429
NASHVILLE TN 37229-0429

SOLSTAS LAB PARTNERS
PO BOX 35907
GREENSBORO NC 27425-5907

TRANSWORLD SYSTEMS INC
150 CROSSPOINT PKWY
GETZVILLE NY 14068-1602

US HEALTHWORKS MEDICAL GROUP
PO BOX 741827
ATLANTA GA 30374-1827

CM/ECF E-SERVICE
US TRUSTEE +
OFFICE OF THE UNITED STATES TRUSTEE
701 BROADWAY STE 318
NASHVILLE TN 37203-3966

DEBTOR
DANITA MICHELLE BOHANNON COHEN
3502 WOOD BRIDGE DRIVE
NASHVILLE TN 37217-4523

CM/ECF E-SERVICE
HENRY EDWARD HILDEBRAND III +
OFFICE OF THE CHAPTER 13 TRUSTEE
PO BOX 340019
NASHVILLE TN 37203-0019

CM/ECF E-SERVICE
JON DANIEL LONG +
LONG BURNETT JOHNSON PLLC
302 42ND AVE NO
NASHVILLE TN 37209-3602